



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

400 Seventh St., S.W.  
Washington, D.C. 20590

APR - 6 2001

Mr. Gene Secor  
EHS/Transportation Specialist  
HB Fuller Company  
25200 Malvina Ave.  
Warren, MI 48089

Reference No.: 01-0042

Dear Mr. Secor:

This is in response to your February 8, 2001 fax inquiring whether the individual serial number of a DOT 57 portable tank must be entered on the shipping paper under the Hazardous Materials Regulations (HMR; 49 CFR, Parts 171-180).

The answer is no, serial numbers of portable tanks are not required to appear on the shipping paper entry, but may appear as additional information. Additional information must be placed after the basic description as specified in § 172.201(a)(4).

I hope this satisfies your request.

Sincerely,

Hattie L. Mitchell  
Chief, Regulatory Review and Reinvention  
Office of Hazardous Materials Standards



01-0042

172.202

FROM :

FAX NO. : 8104471117

Feb. 08 2001 09:03AM P1

**FAX**

Corbin  
\$172.202  
Shipping Papers  
01-0042

**DATE: February 8, 2001**

**TO: RSPA, Office of Hazardous Materials Standards, DHM-10**

**FAX NUMBER: 202-366-3012**

**FROM: GENE SECOR, HB FULLER CO**

**PHONE: 248-526-4783**

**FAX: 810-447-1117**

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**PAGES INCLUDING COVER SHEET: One (1)**

**MESSAGE:** We recently had an audit by a representative of the FMCSA. One of the items from the audit concerns shipment of Tote Tanks (DOT-57 types), less than 1000 gal capacity. The inspector claims that we must mark on the shipping paper individual serial numbers for each tote shipped which contains a hazmat; that way we have a tracking system for the whereabouts of these containers. Although this would be an excellent business practice, I cannot find in the hazardous materials regulations where this requirement is called out for inclusion on shipping papers.

**Is this a regulatory requirement? If so, what is the citation in 49 CFR?**

**Regards,**

**Gene Secor  
EHS/Transportation Specialist  
HB Fuller Company  
25200 Malvina Ave  
Warren, MI 48089**